

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

International Recruiters, Inc.  
d/b/a Dennis Partners,

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Edward Canning, Veronica Richie,  
and Shepherd Search Group, Inc.,

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Defendants.

1:19-cv-10414-IT

v.

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**SECOND AMENDED TEMPORARY RESTRAINING ORDER**

**March 22, 2019**

TALWANI, D.J.

After hearing on March 22, 2019, the court hereby extends the prior Amended Temporary Restraining Order [29], issued on March 19, 2019.

**IT IS HEREBY ORDERED AS FOLLOWS:**

A. The Defendants, along with their agents, servants, employees, attorneys and all parties in active concert or participation with them who receive actual notice of the Order by personal service or otherwise, are enjoined from using, permitting to be used, disclosing, or transmitting for any purpose any of Dennis Partners' confidential or proprietary work product, trade secret, or business information, including but not limited to Dennis Partners' marketing strategies, information concerning Dennis Partners' contracts, proprietary keyword system, form documents (including but not limited to letters and emails), the names, addresses, and specific information about

Dennis Partners' clients and candidates, its pricing, contract terms, and its business development strategy.

- B. The individual Defendants, along with their agents, servants, employees, attorneys and all parties in active concert or participation with them who receive actual notice of the Order by personal service or otherwise, must immediately return all originals, copies, and other reproductions, in any form whatsoever, of any and all documents and information of Dennis Partners, including but not limited to copies of any files accessed, copied, downloaded, deleted, opened, or otherwise modified, from Dennis Partners' PCR and electronic system, including but not limited to the company laptops used by them. The individual Defendants shall also make immediate mirror copies of their personal hard drives to preserve all metadata.
- C. Defendant Shepherd along with its agents, servants, employees, attorneys and all parties in active concert or participation with them who receive actual notice of the Order by personal service or otherwise, must immediately segregate and remove from all active computer files and protect from further access, all originals, copies, and other reproductions, in any form whatsoever, of any and all documents and information of Dennis Partners, including but not limited to copies of any files accessed, copied, downloaded, deleted, opened, or otherwise modified, from Dennis Partners' PCR and electronic system. Defendant Shepherd must also preserve the most recent backups of its computer systems.
- D. Defendants, along with their agents, servants, employees, attorneys and all parties in active concert or participation with them who receive actual notice of the Order by

personal service or otherwise, are ordered to preserve all materials in an appropriate manner for purposes of this litigation, including all metadata.

E. Defendants, along with their agents, servants, employees, attorneys and all parties in active concert or participation with them who receive actual notice of the Order by personal service or otherwise, are ordered to identify in writing any person to whom Canning and/or Ritchie disclosed any of Dennis Partners' trade secrets, confidential information, and/or proprietary information, including detailing any and all such communications.

The court has set a further hearing on the matter for March 27, 2019, at 2:15 p.m. The order shall remain in effect through March 27, 2019, absent further order of the court.

IT IS SO ORDERED.

March 22, 2019

Andria Tcherni  
United States District Judge

10:45 am.